



James W. Boyan

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December 20, 2018

VIA ELECTRONIC FILING

Magistrate Judge Steven M. Gold
US District Court, Eastern District of NY
225 Cadman Plaza East
Chambers 1217, Courtroom 13-D
Brooklyn, NY 11201

Re: Choi v. Home & Home Corp., et al.
Civil Action No. 1:17-cv-05400
Motion to Extend Time to Complete Discovery

Dear Judge Gold:

This firm represents the Defendants in the above referenced matter. We write this letter with plaintiff's counsel's consent to jointly request an extension of the status conference currently scheduled before Your Honor on December 27, 2018.

For background purposes, a request to adjourn the initial conference in this matter due to a scheduling conflict was granted on November 17, 2017. An additional request to adjourn a status conference was also granted on February 22, 2018. Plaintiff's counsel was having medical issues and had not produced discovery responses yet. Moreover, Defendants were in the process of translating a large number of Korean documents into English in order to produce them to Plaintiff. Another request to adjourn a status conference was granted on November 27, 2018. Defendant's representatives had been scheduled for their depositions for November 12, 2018, but one of the representatives was hospitalized with a serious medical condition on the eve of the deposition and depositions could not go forward. Discovery in this matter has been extended four times.

The parties are requesting an adjournment of the December 27, 2018 status conference because depositions of Defendant's representatives are still in the process of being re-scheduled due to the recovery from the medical emergency and the upcoming holidays. In light of these procedural issues and so that the parties can engage in a meaningful discussion at the next conference, we respectfully request the Court to reschedule the status conference for some time in late January 2019.

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Thank you for Your Honor's courtesies and consideration of this request.

Respectfully submitted,

A handwritten signature in black ink that reads "James W. Boyan, III". The signature is written in a cursive style with a prominent "J" and "B".

James W. Boyan III

cc: Keli Liu, Esq., Counsel for Plaintiff (Via electronic filing)